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14	UNITED STATES DISTRICT COURT DISTRICT OF NEVADA	
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16	JOSEPH HOLLEY INDIVIDUALLY AND ON BEHALF OF THE TE-MOAK TRIBE OF	Case No. 2:24-cy-01629
	WESTERN SHOSHONE INDIANS OF	
ا 17		
17 18	NEVADA as Tribal Council Chairman, Plaintiff,	Joint Motion to Modify Schedule for the Filing of Joint Status Reports
	NEVADA as Tribal Council Chairman,	
18	NEVADA as Tribal Council Chairman, Plaintiff, vs. UNITED STATES DEPARTMENT OF THE	
18	NEVADA as Tribal Council Chairman, Plaintiff, vs. UNITED STATES DEPARTMENT OF THE INTERIOR, BUREAU OF INDIAN AFFAIRS; and Bryan Mercier, as Acting Director of the	
18 19 20	NEVADA as Tribal Council Chairman, Plaintiff, vs. UNITED STATES DEPARTMENT OF THE INTERIOR, BUREAU OF INDIAN AFFAIRS; and Bryan Mercier, as Acting Director of the Bureau of Indian Affairs,	
18 19 20 21	NEVADA as Tribal Council Chairman, Plaintiff, vs. UNITED STATES DEPARTMENT OF THE INTERIOR, BUREAU OF INDIAN AFFAIRS; and Bryan Mercier, as Acting Director of the	
18 19 20 21 22	NEVADA as Tribal Council Chairman, Plaintiff, vs. UNITED STATES DEPARTMENT OF THE INTERIOR, BUREAU OF INDIAN AFFAIRS; and Bryan Mercier, as Acting Director of the Bureau of Indian Affairs,	Filing of Joint Status Řeports
18 19 20 21 22 23	NEVADA as Tribal Council Chairman, Plaintiff, vs. UNITED STATES DEPARTMENT OF THE INTERIOR, BUREAU OF INDIAN AFFAIRS; and Bryan Mercier, as Acting Director of the Bureau of Indian Affairs, Defendants.	Filing of Joint Status Řeports e parties—Plaintiff Joseph Holley
18 19 20 21 22 23 24	NEVADA as Tribal Council Chairman, Plaintiff, vs. UNITED STATES DEPARTMENT OF THE INTERIOR, BUREAU OF INDIAN AFFAIRS; and Bryan Mercier, as Acting Director of the Bureau of Indian Affairs, Defendants. On October 7, 2024, this Court ordered the	Filing of Joint Status Reports e parties—Plaintiff Joseph Holley nt of the Interior, Bureau of Indian Affairs, and
18 19 19 20 21 222 23 24 225	NEVADA as Tribal Council Chairman, Plaintiff, vs. UNITED STATES DEPARTMENT OF THE INTERIOR, BUREAU OF INDIAN AFFAIRS; and Bryan Mercier, as Acting Director of the Bureau of Indian Affairs, Defendants. On October 7, 2024, this Court ordered the ("Plaintiff"); Federal Defendants, U.S. Department.	e parties—Plaintiff Joseph Holley at of the Interior, Bureau of Indian Affairs, and

("Mr. McDade")—to file a Joint Status Report on November 1, 2024, and every 28 days thereafter. ECF No. 34. The Parties filed their first Joint Status Report on November 1, 2024. ECF Nos. 38–39. Their next Joint Status Report is due November 29, 2024. Federal Rule of Civil Procedure 6(b)(1) permits an enlargement of time for good cause, such as that requested herein, "if a request is made, before the original time or its extension expires." Good cause exists for a brief seven-day extension of the next joint status report deadline, with the future deadlines resuming every 28 days thereafter. This is the first request to modify the schedule.

The day before the current deadline is November 28, 2024, which is a federal holiday. The next deadline is currently December 27, 2024, which falls between two additional federal holidays, December 25, 2024, and January 1, 2025. Undersigned counsel for Federal Defendants has long-planned leave for the holidays scheduled for November 27 through 29, 2024, and December 27, 2024, through January 2, 2025. By extending the deadline for the next joint status report by seven days to December 6, 2024, with the future deadlines resuming every 28 days thereafter, the following joint status report would be due January 3, 2025.

On November 21, 2024, undersigned counsel for Federal Defendants discussed the instant motion with Plaintiff's counsel, the Housing Authority's counsel, and Mr. McDade via email. Plaintiff's counsel, the Housing Authority's counsel, and Mr. McDade indicated they would join the motion. For the foregoing reasons, the parties respectfully request that this joint motion to modify the schedule for the filing of Joint Status Reports be granted. A proposed order is attached.

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1	DATED this 22nd day of November, 2024.	DATED this 22nd day of November, 2024.
2	SEMENZA RICKARD LAW	THE LAW OFFICES OF CHARLES R. ZEH, ESQ
3	/s/ Jarrod L. Rickard, Esq. Jarrod L. Rickard, Esq., Bar No. 10203	<u>/s/ Charles R. Zeh, Esq.</u> Charles R. Zeh, Esq., Bar No. 1739
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5	&	Reno, NV 89501
6	JOHN W. MUIJE & ASSOCIATES John W. Muije, Esq., Bar No. 2419	Attorneys for the Housing Authority of the Te-Moak Tribe of Western Shoshone Indians of
7	3216 Lone Canyon Court N. Las Vegas, NV 89031	Nevada
8	Attorneys for Plaintiff	
9	DATED this 22nd day of November 2024	DATED this 22nd day of November, 2024.
10		DATED this 22hd day of November, 2024.
11	TODD KIM, Assistant Attorney General	
12	/s/ Michelle Ramus Michelle Ramus	/s/ Steven Joseph McDade Steven Joseph McDade
13	& Amber Dutton-Bynum	TeMoak Prosecutor PO Box 2568
14	United States Department of Justice	Elko, NV 89801
15	Environment & Natural Resources Division Natural Resources Section	
16	P.O. Box 7611 Washington, D.C. 200044-7611	
17	JASON M. FRIERSON, Nevada Bar No. 77	709
18	United States Attorney, District of Nevada KARISSA D. NEFF, Nevada Bar No. 9133	•
19	Assistant United States Attorney	
20	501 Las Vegas Blvd. So., Suite 1100 Las Vegas, Nevada 89101	
	21 Counsel for Defendants	
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UNITED STATES DISTRICT COURT DISTRICT OF NEVADA

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8 INTERIOR, BUREAU OF INDIAN AFFAIRS; and Bryan Mercier, as Acting Director of the Bureau of Indian Affairs,

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Case No. 2:24-cv-01629

[Proposed] Order Granting Joint Motion to Modify Schedule for the Filings of Joint Status Reports

Having considered the Parties' Joint Motion to Modify Schedule for the Filing of Joint Status Reports in the above-captioned case, and pursuant to Federal Rule of Procedure Rule 6(b)(1), it is hereby ORDERED that the motion is GRANTED. Therefore, the Parties are to file their next Joint Status Report on December 6, 2024, and every 28 days thereafter, apprising the Court of whether the stay should remain or be lifted.

Dated: November <u>26</u>, 2024.

JOSEPH HOLLEY INDIVIDUALLY AND ON BEHALF OF THE TE-MOAK TRIBE OF

UNITED STATES DEPARTMENT OF THE

WESTERN SHOSHONE INDIANS OF

NEVADA as Tribal Council Chairman,

Plaintiff,

Defendants.

The Hororable Gloria M. Navarro United States District Judge